

**MEMORANDUM**

MEMO BY \_\_\_\_\_ TO \_\_\_\_\_ DATE \_\_\_\_\_

FILE TITLE Meeting With the Utah Department of Health (DOH)

April 29, 1983

A meeting was held on April 29, 1983 among representatives of the Utah DOH, the Utah State Attorney General's Office, the Intermountain Power Project (IPP), The Washington, D.C. law firm of Hunton & Williams and the Utah law firm of Van Cott, Bagley, Cornwall & McCarthy to discuss IPP air quality permit modification issues.

Attached is a list of attendees.

Air Quality Control Equipment

The Utah DOH stated the following regarding the air quality control systems proposed for IPP:

(1) A new limited review of Best Available Control Technology (BACT) will be required by the DOH for sulfur dioxide ( $SO_2$ ), particulate and oxides of nitrogen ( $NO_x$ ) control systems. This limited review will consider the adequacy of the original BACT analysis, the appropriateness of the original BACT analysis for 1983, and the proposed control equipment changes in the context of existing air quality permit requirements.

(2) The DOH has reviewed the specifications for the fabric filter systems for IPP and is prepared to recommend that these systems are BACT for particulate control at the

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existing permit emission limit of 0.02 lbs/MBTU.

- (3) The DOH is currently completing review of the specifications for the limestone scrubber for IPP. Although the DOH has previously approved an application for 95 percent SO<sub>2</sub> removal efficiency as BACT, the DOH will likely approve the proposed IPP scrubber as BACT at 90 percent SO<sub>2</sub> removal efficiency.
- (4) The DOH has made little progress in the limited BACT review of NO<sub>x</sub> control for IPP. The DOH will require additional information on low NO<sub>x</sub> burner design and operation in order to evaluate this technology as BACT. The final BACT determination for IPP could range anywhere from existing low NO<sub>x</sub> burners to selective catalytic reduction (SCR) systems. In addition, a new permit limit for NO<sub>x</sub> emissions may be required. (Discussions with DOH staff after the meeting revealed that consideration is being given for a new NO<sub>x</sub> permit limit of 0.15 lbs/MBTU.)

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(3)

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FILE TITLE \_\_\_\_\_Status of Construction

At the request of the DOH, a brief update on the status of construction at the IPP site was provided. The DOH responded to this information by stating that the current construction is not valid under the existing air quality permit and that IPP is building a source without proper approval from the DOH. It was emphasized that erection of steel at the site violates Utah state law and that the DOH is authorized to issue a "Cease and Desist Order" to IPP for such violations. However, it appears that the DOH will NOT issue such an order at the present time unless pressured to do so by environmental groups.

A recommendation was made by IPP representatives for the DOH to consider separate approval orders for SO<sub>2</sub>, NO<sub>x</sub> and particulate control systems, as opposed to a single approval order for all 3 systems. This could result in immediate approval of the incinerator and scrubber systems which would allow construction of these systems to legally continue while the NO<sub>x</sub> control issue is being resolved. The DOH appeared somewhat receptive to this recommendation at the meeting; however, it was later learned that the DOH had decided not to issue separate approval orders unless legal action regarding the status of

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construction at IPP was initiated by environmental groups. At such time, the DOH would likely issue a separate approval order for the baghouse.

IPP Status Meeting - Apr 29, 1983

Name	Comments / Agencies	Tel
Montie Hollen	Pur of Air, Air Quality	801-533-6108
Ron Nelson	LADWP - IPP	213-481-3536
Roger Pelote	LADWP - Air Quality	213-481-3412
Steve Clark	LADWP - Air Quality	213-481-3502
James Holteamp	UCBCCM	532-3333
Henry Nickel	" Huston & Williams	202-223-865
Reid Searle	Intermountain Power Agency	262-8807
Clark Layton	" " "	"
Fred Nelson	Atty Gen Office	533-6684
D Brent C Bradford	UBAQ	533-6108
David Kopta	"	"